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January 18, 2013

Louis J. Micca, Esq.
11 State Street
Pittsford, NY 14534

Re: Samuel Roberts v. Los Alamos National Security, LLC, et al. v. University of Rochester

Dear Lou:

On behalf of Defendant Los Alamos enclosed herewith please find a CD containing in excess of 10,000 pages of material. Since you refused to engage in any good faith discussions regarding electronic discovery and you refused to provide us with any search term requests, and told us that what you wanted was "everything", we have utilized our own keyword search terms on a wide ranging basis.

Please note that the material produced is not specifically responsive to Plaintiff's narrow discovery demands except to the extent there may be duplication of documents previously produced. Further, by producing this material, Defendant Los Alamos does not concede that any of it is relevant to the disputes being litigated in this case and specifically preserves all objections to relevance and admissibility.

Very truly yours,

WOODS OVIATT GILMAN LLP



Beryl Nusbaum

BN/adm
Enclosure

cc: Eric J. Ward, Esq. (w/encl)
David Rothenberg, Esq. (w/encl)
Christine Tramontano, Esq. (w/encl)